

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

Adv. Pro. No. 10-04616 (SMB)

NICOLETTE WERNICK NOMINEE
PARTNERSHIP; MARITAL GST EXEMPT
TRUST F/B/O NICOLETTE WERNICK U/
ARTICLE III OF THE HAROLD WERNICK
REVOCABLE TRUST DTD 9/16/1991, in its
capacity as a Partner of the Nicolette Wernick
Nominee Partnership; MARITAL GST NON-
EXEMPT TRUST F/B/O NICOLETTE WERNICK
U/ ARTICLE III OF THE HAROLD WERNICK
REVOCABLE TRUST DTD 9/16/1991, in its
capacity as a Partner of the Nicolette Wernick
Nominee Partnership; M. GORDON EHRLICH, in
his capacity as managing partner of the Nicolette
Wernick Nominee Partnership and as Trustee of the
Marital GST Exempt Trust f/b/o Nicolette Wernick
u/ Article III of the Harold Wernick Revocable
Trust dtd 9/16/1991 and as Trustee of the Marital
GST Non-Exempt Trust f/b/o Nicolette Wernick u/
Article III of the Harold Wernick Revocable Trust

dtd 9/16/1991; NICOLETTE WERNICK, individual and in her capacity as partner of the Nicolette Wernick Nominee Partnership and as Trustee of the Marital GST Exempt Trust f/b/o Nicolette Wernick u/ Article III of the Harold Wernick Revocable Trust dtd 9/16/1991 and as Trustee of the Marital GST Non-Exempt Trust f/b/o Nicolette Wernick u/ Article III of the Harold Wernick Revocable Trust dtd 9/16/1991; and HOPE WIGMORE, in her capacity as Trustee of the Marital GST Exempt Trust f/b/o Nicolette Wernick u/ Article III of the Harold Wernick Revocable Trust dtd 9/16/1991 and as Trustee of the Marital GST Non-Exempt Trust f/b/o Nicolette Wernick u/ Article III of the Harold Wernick Revocable Trust dtd 9/16/1991,

Defendants.

NOTICE OF EXTENDED RESPONSE DUE DATE

On November 10, 2010, this Court entered the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Adv. Pro. No. 08-01789 (SMB), Dkt. No. 3141]. Pursuant to the Notice of Applicability filed by Plaintiff, Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Services LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et. seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually (“Madoff”), in this Adversary Proceeding on December 6, 2010 [Dkt. No. 2], the Order and the avoidance procedures contained therein (the “Avoidance Procedures”) are applicable to the instant matter.

Pursuant to the Avoidance Procedures, § 2(E), the Trustee is required to file a “Notice of Extended Response Due Date” upon the termination of mediation setting forth the new response due date.

The mediation of the Adversary Proceeding took place at the offices of Baker & Hostetler LLP in New York, New York on October 29, 2014. The mediation was unsuccessful

and the deadline to conclude mediation passed on November 14, 2014. In accordance with the Order, the Extended Response Due Date for Defendants to respond to the Complaint is Friday, January 16, 2015.

Dated: December 4, 2014
New York, New York

Respectfully submitted,

Of Counsel:

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Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff*